

THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

KATHERINE BELCASTRO GONZALEZ,

Plaintiff,

vs.

CITY OF OMAHA, et al.,

Defendants.

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Case No. 8:19-CV-572

**MOTION TO
RESTRICT ACCESS**

Pursuant to NECivR 5.3(c), Defendants City of Omaha and Todd Schmaderer (“Defendants”) respectfully move the Court for an Order restricting access to Defendants’ Brief in Support of Summary Judgment and Index of Exhibits in Support of Motion for Summary Judgment and attachments to Defendant’s Index in support of Motion for Summary Judgment (collectively “Defendants’ Summary Judgment Materials”).

In support of this Motion, Defendants state as follows:

1. Plaintiff and Defendants agreed to a Joint Motion for Protective Order (Doc. 37).
2. Pursuant to the Protective Order, “Discovery material designated as ‘CONFIDENTIAL’ shall be held in confidence by each Qualified Recipient to whom it is disclosed, shall be used only for purposes of this action, and shall not be disclosed to any person who is not a Qualified Recipient. Each party, each Qualified Recipient, and all counsel representing any party, shall use their best efforts to maintain all information designated as ‘CONFIDENTIAL’ in such a manner as to prevent access, even at a hearing or trial, by individuals who are not Qualified Recipients.” (Doc. 37, p. 5)

3. Defendants' Summary Judgment Materials include confidential information, including Internal Investigation information, personnel information and other confidential matters.
4. To protect confidential information Defendants request the Court restrict access to Defendants' Summary Judgment Materials to case participants.

For these reasons, Defendants respectfully requests the Court grant this Motion to Restrict Access and direct the Clerk of the Court to restrict access to Defendants Motion for Summary Judgment Materials to case participants.

CITY OF OMAHA, et al.,
Defendants

By /s/ Michelle Peters
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CERTIFICATE OF SERVICE

I hereby certify that on the 6th day of May, 2022, I electronically filed the foregoing **MOTION TO RESTRICT ACCESS** with the Clerk of the Court using the CM/ECF system which will send notification of such filing to attorneys of record.

s/Michelle Peters